

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

19-CR-227-LJV

JOSEPH BONGIOVANNI,
PETER GERACE, JR.,

Defendants.

UNITED STATES OF AMERICA,

v.

23-CR-37-LJV-MJR

PETER GERACE, JR.,

Defendant

MOTION FOR DETERMINATION OF CONFLICT OF INTEREST

PLEASE TAKE NOTICE that, upon the attached affidavit, filed separately under seal, the undersigned hereby move this Court for an inquiry to determine whether a conflict of interest exists in the present representation of defendant Peter Gerace, Jr., by attorney Steven M. Cohen, and for such further relief as the Court may deem proper.

DATED: Buffalo, New York, June 26, 2023

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